

## **EXHIBIT C**



Writer's Direct Dial (312) 696-2032

GOLAN & CHRISTIE LLP  
70 WEST MADISON STREET  
SUITE 1500  
CHICAGO, ILLINOIS 60602-4206  
PHONE (312) 263-2300  
FAX (312) 263-0839  
GOLANCHRISTIE.COM

Ashley L. Orlor, Esq.  
[alorler@golanchristie.com](mailto:alorler@golanchristie.com)

February 25, 2013

VIA EMAIL and U.S. MAIL

Mr. Eric T. Stach  
Del Galdo Law Group, LLC  
1441 South Harlem Avenue  
Berwyn, IL 60402  
[stach@dlglawgroup.com](mailto:stach@dlglawgroup.com)

***Re: Dr. Jane Montes v. Cicero Public School District 99, et al.***

Dear Eric:

This letter confirms the agreements reached during our telephone conversation on February 22, 2013 regarding written discovery in the instant case.

Dr. Montes issued Requests for Production of Documents to Defendants Donna Adamic and Michael Dziallo on December 4, 2012. Responses to these Document Requests were due on January 7, 2013 but to date, my office has not received any responses. During our telephone conversation you requested and I agreed to provide Ms. Adamic and Mr. Dziallo an additional twenty-one (21) days, up to and including March 15, 2013, to respond to the outstanding Document Requests.

You indicated that Defendants are in possession of thousands of pages of electronic records. To assist in the efficient production of relevant electronic records, I agreed to provide search terms to you by March 1, 2013.

Regarding the November 26, 2012 correspondence from my colleague, Peter Katsaros, to you and Mr. Zimmer, which specifies categories of documents missing from District 99's production of documents, you agreed to address the specific items identified in the correspondence on or before March 8, 2013.

If there is anything in this letter that you believe does not accurately reflect our telephone conversation and the agreements reached, please bring it to my attention as soon as possible. As you are aware, on January 31, 2013, Magistrate Judge Rowland ordered that major depositions in the case be conducted by May 17, 2013. We will not be able to conduct the depositions of Ms.



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Adamic, Mr. Dziallo, and Karen Mulattieri without good faith compliance with outstanding written discovery requests.

Very truly yours,

GOLAN & CHRISTIE LLP

A handwritten signature in cursive script, appearing to read "Ashley Orlor".

Ashley L. Orlor

cc: Peter M. Katsaros, Esq.